

1 Honorable Kymberly K. Evanson
2
3
4
5
6
7
8
9

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10 SHENZHEN ROOT TECHNOLOGY CO., LTD.,
11 HONG KONG LUTE TECHNOLOGY CO.,
12 LIMITED, AND SHENZHEN CONGLIN E-
13 COMMERCE CO., LTD.,

Plaintiffs,

v.

14 CHIARO TECHNOLOGY Ltd.,

15 Defendant.

16 CHIARO TECHNOLOGY LTD.,
17 Counterclaim Plaintiff,

v.

18 SHENZHEN ROOT TECHNOLOGY CO., LTD.,
19 HONG KONG LUTE TECHNOLOGY CO.,
20 LIMITED, SHENZHEN CONGLIN E-
21 COMMERCE CO., LTD., SHENZHEN ROOT E-
22 COMMERCE CO., LTD., SHENZHEN TPH
23 TECHNOLOGY CO., LTD., SHENZHEN
JINRUIXING TECHNOLOGY CO., LTD.,
SHENZHEN LUTEJIACHENG NETWORK
TECHNOLOGY CO., LTD., and SHENZHEN
JINRUIHANG TECHNOLOGY CO., LTD.,

24 Counterclaim Defendants.

Case No. 2:23-cv-631

**STIPULATED MOTION AND
[PROPOSED] ORDER RE:
REBUTTAL EXPERT DISCLOSURE
DEADLINE**

Note on Motion Calendar:
January 9, 2025

STIPULATION

WHEREAS, the parties have agreed to extend the current deadline for Rebuttal Expert Disclosures for Claim Construction currently set for January 10, 2025 (*see* Dkt. #124 and #119), to January 17, 2025;

WHEREAS, the requested extension is being requested by the Defendant, Counterclaim/Plaintiff, Chiaro Technology, Ltd., in view of unavailability of certain experts due to Holiday and/or personal travel; and

WHEREAS, the requested extension of time will not impact any other case deadlines.

So stipulated and agreed this 9th day of January 2025.

Respectfully submitted,

ARÊTE LAW GROUP PLLC

By: /s/ Jeremy Roller
Jeremy E. Roller (WSBA 32021)
jroller@aretelaw.com
600 University Street, Suite 2420
Seattle, WA 98101
T: 206.428.3250
F: 206.428.3251

Carl E. Bruce (*pro hac vice*)
bruce@fr.com
Matthew A. Colvin (*pro hac vice*)
Colvin@fr.com
FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
T: 214.747.5070
F: 214 747 2091

Kelly Del Dotto (*pro hac vice*)
Allenspach.del.dotto@fr.com
FISH & RICHARDSON P.C.
222 Delaware Avenue, 17th Floor
Wilmington, DE 19801
T: 302.652.5070
F: 302.652.0607

Attorney for Plaintiffs,

1 ; SHENZHEN ROOT TECHNOLOGY CO., LTD.,
2 HONG KONG LUTE TECHNOLOGY CO.,
3 LIMITED, SHENZHEN CONGLIN E-
4 COMMERCE CO., LTD., SHENZHEN ROOT E-
COMMERCE CO., LTD., SHENZHEN
5 LUTEJIACHENG NETWORK TECHNOLOGY
6 CO., LTD, AND SHENZHEN JINRUIHANG
7 TECHNOLOGY CO., LTD.

8 /s/ Mark P. Walters
9

10 Mark P. Walters, WSBA No. 30819
11 Mitchell D. West, WSBA No. 53103
12 **LOWE GRAHAM JONES PLLC**
13 *walters@LoweGrahamJones.com*
14 *west@LoweGrahamJones.com*
15 1325 Fourth Avenue, Suite 1130
16 Seattle, WA 98101
17 T: 206.381.3300
18 F: 206.381.3301

19 /s/ Nirav N. Desai
20

21 Nirav N. Desai (*pro hac vice*)
22 Josephine Kim (*pro hac vice*)
23 Joseph Kim (*pro hac vice*)
24 Alex Alfano (*pro hac vice*)
25 Alexander Covington (*pro hac vice*)
Paige Cloud (*pro hac vice*)
Michael Webb (*pro hac vice*)
Zachary L. Jacobs (*pro hac vice*)
Christopher Coleman (*pro hac vice*)
STERNE, KESSLER, GOLDSTEIN & FOX PLLC
1101 K Street, NW
10th Floor
Washington, D.C. 20005
T: 202.371.2600
F: 202.371.2540

26 *Attorney for Defendant Chiaro Technology,
27 Ltd.*

1
2
3 **[PROPOSED] ORDER**

4 Having reviewed the parties' stipulation and finding GOOD CAUSE for the requested
5 extension of time, the Court HEREBY ORDERS that the deadline for Rebuttal Expert
6 Disclosures for Claim Construction currently set for January 10, 2025 (*see* Dkt. #124 and #119),
7 is HEREBY EXTENDED to January 17, 2025.

8 SO ORDERED

9 DATED this _____ day of _____, 2025

10
11
12 The Honorable Kymberly K. Evanson
13 United States District Court Judge

14 Presented by:

15 LOWE GRAHAM JONES PLLC
16 Mark P. Walters, WSBA No. 30819
17 *Walters@LoweGrahamJones.com*
18 1325 Fourth Avenue, Suite 1130
Seattle, WA 98101
T: 206.381.3300
F: 206.381.3301